UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

SARAH BAKER,)	
)	
Plaintiff,)	
)	Case No. 19-CV-07118
v.)	
)	Judge Shah
CLARITY CLINIC LLC, CLARITY)	
CLINIC ARLINGTON HEIGHTS, LLC,)	
and PAVAN PRASAD,)	
individually,)	
)	
Defendants.)	

PLAINTIFF'S MOTION FOR DEFAULT AS TO DEFENDANT CLARITY CLINIC ARLINGTON HEIGHTS, LLC

Pursuant to Fed. R. Civ. P. 55(a), Plaintiff Sarah Baker ("Plaintiff") moves for an order of default against Defendant Clarity Clinic Arlington Heights, LLC ("Defendant"). In support of this motion, Plaintiff states as follows:

- 1. Plaintiff brought claims under Title VII of the Civil Rights Act of 1964, as amended ("Title VII"), 42 U.S.C. § 2000e *et seq.*, and the Illinois Human Rights Act ("IHRA"), 775 ILCS 5/2-101, *et seq.* ECF No. 1.
- 2. Plaintiff filed her complaint on October 29, 2019 against Defendants Clarity Clinic LLC, Clarity Clinic Arlington Heights, LLC and Pavan Prasad, individually. ECF No. 1.
- 3. Defendant Clarity Clinic Arlington Heights, LLC was served on November 5, 2019. ECF No. 8. Based on the date of service, Defendant Clarity Clinic Arlington Heights, LLC's answer to the Complaint was due on or before November 26, 2019. Fed. R. Civ. P. 12(a)(1)(A)(i).
 - 4. To date, Defendant Clarity Clinic Arlington Heights, LLC has not responded to

Plaintiff's Complaint, filed an appearance in this matter, or otherwise taken action to defend itself in this action.

5. Defendant Clarity Clinic Arlington Heights, LLC's failure to respond to Plaintiff's Complaint or "otherwise defend" itself in this action entitles Plaintiff to an order of default. Fed. R. Civ. P. 55(a).

WHEREFORE, Plaintiff requests that this Court enter an order of default against Defendant Clarity Clinic Arlington Heights, LLC.

Date: December 5, 2019 Respectfully Submitted,

s/Maureen A. Salas
One of Plaintiff's Attorneys

Douglas M. Werman - dwerman@flsalaw.com
Maureen A. Salas - msalas@flsalaw.com
Sarah J. Arendt - sarendt@flsalaw.com
Jacqueline H. Villanueva – jvillanueva@flsalaw.com
WERMAN SALAS P.C.
77 W. Washington, Suite 1402
Chicago, IL 60602
(312) 419-1008